

April 15, 2005

Mr. Richard H. Karney, P.E.  
ENERGY STAR Program Manager  
U.S. Department of Energy (DOE)

Re: Comments on Revisions to ENERGY STAR<sup>®</sup> Criteria for Clothes Washers

Dear Mr. Karney:

These comments are submitted in response to your notice of March 28, 2005, regarding the proposed 2007 criteria for Energy Star clothes washers. The East Bay Municipal Utility District (EBMUD), as an ENERGY STAR partner and member of the Steering Committee for Water Efficient Products supports the proposed revisions to the ENERGY STAR<sup>®</sup> Criteria for Clothes Washers. We commend DOE for accepting recommendations to strengthen water efficiency through the adoption of a water factor for Energy Star rated clothes washers. Incorporating a water factor requirement and increasing the required energy efficiency level are significant and positive changes that will maintain and enhance the impact of energy- and water-efficient clothes washer labeling and market enhancement programs.

EBMUD has offered its customers incentives for high-efficiency clothes washers since 1995 and has coordinated its promotions with neighboring water agencies, and with Pacific Gas and Electric Company. Currently, EBMUD and its Northern California water utility partners reference the Consortium for Energy Efficiency (CEE) listing for product qualification. The tiered CEE clothes washer listing serves as a basis for offering multiple incentive levels to facilitate the promotion of premium water efficiency. We recognize that the proposed water factor of 8.0 will inform consumers about products with significantly improved performance, however, a closer alignment of the ENERGY STAR criteria with CEE tiers such as a water factor of 7.5 would promote additional water (and energy) savings while allowing utilities better leverage of water efficiency labeling.

The Department's analysis of potential savings captures energy savings resulting from product end use, much of which is related to reducing consumption of heated water. Also related to water efficiency are energy savings associated with water system sources, conveyance, distribution, and treatment (water and wastewater). Incorporation of these factors in future analysis may better reflect the connection between energy and water use efficiency and improve the valuation of water savings.

EBMUD views the revised ENERGY STAR criteria as an important milestone in the ongoing research and dialogue to advance a water-efficiency market enhancement program(s). We appreciate the opportunity to comment and we look forward to continued stakeholder involvement in future energy and water efficiency market enhancement initiatives.

Sincerely,



Richard W. Harris  
Water Conservation Manager

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